

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION**

**BERLIE CATLIN MOORE** )  
                                )  
                                )  
**Plaintiff,**                 )  
                                )  
                                )  
**vs.**                         )      **Case No.: 2:07-CV-195-ID**  
                                )  
                                )  
**FRANK LEE YOUTH CENTER, et al.** )  
                                )  
                                )  
**Defendants.**                 )

**MOTION FOR EXTENSION OF TIME**

Come now the Defendants, **Vivian Langford and Debra Martin**, by and through the undersigned counsel, and move for an extension of time of thirty (30) days to file their Answer and Special Report in this cause and for grounds state as follows:

1.       The Defendants' Answer and Special Report in this cause are due April 30, 2007.
2.       Undersigned counsel has not received all of the information necessary to file a response to Plaintiff's complaint.
5.       The Defendants' Answer and Special Report cannot be prepared without these affidavits and records.
6.       This is said Defendants first request for an extension.
7.       This enlargement is not requested for any improper purpose and should not prejudice or disadvantage the Plaintiff.

WHEREFORE, based on the foregoing, Defendants respectfully request an enlargement of time for thirty (30) additional days, up to and including **May 30, 2007**, to file their Answer and Special Report.

Respectfully Submitted,

/s/ J. MATT BLEDSOE  
J. MATT BLEDSOE  
Assistant Attorney General  
Counsel for Defendants

OF COUNSEL:

OFFICE OF THE ATTORNEY GENERAL  
11 South Union Street  
Montgomery, AL 36130  
(334) 242-7443  
(334) 242-2433 (fax)

**CERTIFICATE OF SERVICE**

I do hereby certify that I have, this 30<sup>th</sup> day of April, 2007, electronically filed the foregoing pleading with the Clerk of the Court, using the CM/ECF system, and that further, I have served a copy of the foregoing on the Plaintiff, by placing same in the United States Mail, postage prepaid, and properly addressed as follows:

Berlie Catlin Moore, #240553  
Frank Lee Youth Center  
PO Box 220410  
Deatsville, AL 36022

/s/ J. MATT BLEDSOE  
OF COUNSEL